

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Michael Cobbledick

Case: 2:21-mj-30327

Judge: Unassigned,

Filed: 07-02-2021 At 08:39 AM

CMP USA V COBBLEDICK (kcm)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Beginning in 2017 until July 1, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 USC § 2251

18 USC § 2252A(a)(2)

18 USC § 2252A(a)(5)(B)

Attempted Production/Production of Child Pornography

Receipt of child pornography

Possession of child pornography

This criminal complaint is based on these facts:

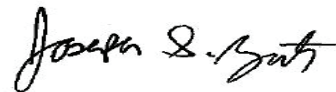
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 1, 2021

City and state: Detroit, Michigan



Complainant's signature

Joseph Zutz, Special Agent (HSI)

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Joseph Zutz, being first duly sworn, state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent (“SA”) with U.S. Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) since October 28, 2019 and am assigned to the Cyber Group with HSI Detroit since March 2021. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through attendance at the HSI Special Agent Training Academy Program and everyday work related to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Prior to employment with HSI, I was a SA with the U.S. Secret Service involved in computer forensics where I had experience through the examination of digital media for discovery of child pornography. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A, and I am authorized by law to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Michael James COBBLEDICK for violations of Title 18, United States Code, Sections 2251, 2252 and 2252A(a)(5)(b) and 2252A(a)(2), which criminalize, among other things, the production, attempted production, possession, receipt, and distribution of child pornography and other related materials.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Michael James COBBLEDICK.

4. Pursuant to the provisions of Title 18, United States Code, section 2256, “child pornography,” as used in this affidavit, includes any visual depiction, including any photograph, film, video, picture, or computer generated image or

picture of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct.

### **BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE**

5. HSI is currently investigating child pornography trafficking by targets who created online accounts with a foreign based cloud-storage provider, Mega, and which accounts contained images and/or videos depicting child pornography. Mega is available to the general public for legitimate, non-criminal purposes, but investigation has revealed that some users engage in child pornography trafficking on this cloud-storage provider by means of sharing links to Mega folders containing child pornography. The current investigation targets individuals associated with such Mega accounts.

6. In 2019, an individual posted a Mega link, providing a link to an account that contained numerous files of child pornography, including but not limited to the files listed below:

- a. File “cp08.mp4” is a five minute and thirty second (5:30) video file depicting a minor age female approximately 10-12 years of age fully nude being made to perform oral sex on an adult male. The adult male is wearing no shirt and underwear that is pulled down below his penis while sitting on a brown couch. The minor age female is made to go up and down on the adult male’s penis repeatedly. The minor age female then

takes the adult male's penis out of her mouth and is being made to use her tongue to lick the adult male's penis. The minor age female is then made to get on top of the adult male exposing her full nude body and genitalia facing the recording device and the adult male inserts his erect penis into the minor age female's vagina. The adult male then continues to rub his penis on the minor female's vagina.

b. File "15yo Bryson pumps his 9yo sister.avi" is a six minute and fifty second (6:50) video file depicting a minor age male approximately 15-17 years of age fully nude standing next to a bed with an erect penis where a minor age female approximately 8-10 years of age is being made to put her hand go back and forth on the erect penis. The minor age female then lays down on the bed on her back and pulls down her pants and underwear exposing her vagina. The minor age male then inserts his penis into the minor age female's vagina repeatedly. The minor age female then stands up and turns around with her feet on the floor and stomach on the bed and the minor age male then repeatedly inserts his penis into her vagina. The minor age female then lays back down on her back and the minor age male again repeatedly inserts his penis inside of her vagina.

c. File "1 (2).mp4" depicts is a two-minute (2:00) video file depicting a minor age female approximately 8-10 years of age laying fully nude on a

bed on her back with her legs spread open exposing her genitalia. The minor age female is being made to motion with her pointer finger back and forth to an adult male who is fully nude except a black mask covering his head with eyes, nose, and mouth holes in the mask. The adult male then goes towards the minor age female and performs oral sex on the minor age female. The adult then places his mouth on her nipples and inserts his tongue into the minor's mouth while pressing his nude body on her nude body. The adult male then stands on the bed with an exposed erect penis and the minor age female is made to masturbate the adult male's penis.

7. Investigation using IP address and other information determined that the owner of the Mega account which contained the above-referenced child pornography was Michael COBBLEDICK and I obtained a search warrant for his residence. On July 1, 2021 personnel from HSI Detroit executed a federal search warrant at \*\*\*\*\*, Royal Oak, MI where Michael COBBLEDICK was encountered at the residence at that time and detained.

8. HSI Detroit SA Joseph Zutz and SA Laura Trainer spoke with Michael COBBLEDICK regarding the nature of the search warrant. Michael COBBLEDICK agreed to speak with law enforcement. Michael COBBLEDICK was informed he was not under arrest at this time. Michael COBBLEDICK was read his Miranda rights and signed ICE form Statement of Rights. Michael

COBBLEDICK stated he understood his rights and was willing to speak to HSI agents. This interview was recorded in its entirety. Michael COBBLEDICK made the following pertinent, non-verbatim statements:

- a. Michael COBBLEDICK stated child pornography was the viewing of kids under the age of 18 who perform sexual acts. Approximately 2015/2016 he used the chat program Kik where he entered chat groups centered around child pornography utilizing his cellphone. While in the “teen group”, he saw that child pornography was being actively traded, and viewed images and videos of child pornography.
- b. Approximately 2015/2016, Michael COBBLEDICK stated he was contacted for child pornography by direct message asking if he had anything to trade. Michael COBBLEDICK replied that he wasn’t looking to trade but sent the requester the child pornography he did have saved in the form of a Mega hyperlink containing a folder of child pornography. The youngest age of those depicted in the collection of child pornography was seven years girls. Although Michael COBBLEDICK did not request child pornography, he was sent in direct message child pornography.

- c. Michael COBBLEDICK stated he uses various gmail email address with multiple Mega and a couple dozen dropbox accounts to save child pornography. The most current file hosting account that contains child pornography is associated with an email address and that he last accessed it in approximately June 2021.
- d. Michael COBBLEDICK stated, approximately six months to a year ago, he shared the above-reference hyperlink.
- e. Michael COBBLEDICK stated he met, approximately five to six months ago, a female girl “Genevieve” who is approximately 17 or 18 on the app “Yolo” [Yobo] who lives in Texas. Michael COBBLEDICK remains in contact with her on an approximate daily basis. In June 2021, “Genevieve” asked for pictures which he sent one of his penis. In return, he asked for a picture which she sent a picture of her breasts and vagina.
- f. Michael COBBLEDICK stated he last viewed child pornography approximately the week of June 21, 2021.

9. On July 1, 2021, a polygraph examination was conducted by FBI SA Mike Fitzgerald at the FBI Detroit Office. Post exam, Michael COBBLEDICK was



interviewed by SA Fitzgerald, SA Zutz, SA Trainer regarding his sexual involvement with minor children:

- a. Michael COBBLEDICK stated he was 22 years old when he had contact with a 16 year old female by the name of Madison who lives in Virginia. Michael COBBLEDICK and Madison on “Yolo” and exchanged snapchat usernames. Over a period of a month they chatted, which he sent to her videos of himself masturbation with an exposed penis three to four times.
- b. Michael COBBLEDICK described his contact with “Genevieve”. Michael COBBLEDICK stated he has been chatting with her for the past eight months to a year. “Genevieve” would send videos of herself masturbating, and Michael COBBLEDICK has sent up to a dozen videos of himself masturbating with the most recent in June 2021.

10. During the execution of the federal search warrant at the residence, the following items were seized, and Computer Forensic Examiner SA Alley conducted a forensic preview of Cobbledick’s devices. CFA/SA Alley made the following observations:

- a. iPhone 11:

- Numerous videos and images of confirmed or believed child pornography, to include child pornography involving prepubescent children bestiality
- The Mega application installed but not logged into
- The Snapchat application logged in with username matchew0320. This account appears to have chats with user dkeum73, vanity name “Genevieve”.

- The Telegram application logged in with a conversation between Cobbledick and Telegram user @shifty\*\*\*\*\*, in which Cobbledick states “I’m down to trade, what ages you looking for”. @Shifty\*\*\*\*\* replies 12-16 and Cobbledick states “Alr bet send me some and I’ll send back”. @shift\*\*\*\*\* requests the Cobbledick send first and Cobbledick states “Yeah that’s fine and lk people are shitty when they so shitty when they do that. Cobbledick then sends 5 videos, all of which appear to involve underage or prepubescent females, three of which appear to be child pornography

- A conversation with telegram user @Tyler\*\*\* in which Cobbledick and this user trade videos that CFA/SA Alley cannot access. Cobbledick states “You got any girls like you know in real life though, all the girls I sent I actually personal know”. Cobbledick then sends this user an invite to join a Telegram group titled “YOUNG \*\*\*\*\* 13-17 Post what you want”

b. iPhone 4:

- Numerous videos and images of child pornography, in some cases involving prepubescent children, contained in the gallery of this iPhone
- The KIK application installed and logged into with username \*\*\*\*\*. CFA/SA Alley observed the following conversations of investigative merit:

- A January, 2019 between Cobbledick and a KIK user who claims to be a 17 year old male. Cobbledick is claiming to be a 16 year old female during this conversation. Cobbledick makes numerous requests to see this male's penis, to include "will you show me your dick", "Yeah, if you send one first", "I can't wait to see your dick, how big is your dick" and "can I see your dick now".

- A conversation with kik user wolfram\*\* in which he and Cobbledick trade numerous images of child pornography, to include a series of images sent by Cobbledick involving a prepubescent female and an adult male that is a known child pornography series.

### **III. CONCLUSION**

11. Your Affiant respectfully submits that there is probable cause to believe that Michael James COBBLEDICK violated Title 18, United States Code,

Sections 2251, 2252 and 2252A(a)(5)(b) and 2252A(a)(2), which criminalize, among other things, the possession, receipt, and distribution of child pornography and other related materials.

12. Wherefore by this affidavit and application, Affiant requests that the Court authorize the issuance of a criminal complaint and arrest warrant for Michael James COBBLEDICK.

Respectfully submitted,



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Joseph S. Zutz, Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Sworn to before me and signed in my presence and/or by reliable electronic means on this 1<sup>st</sup> day of July, 2021.



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Curtis Ivy, Jr.  
United States Magistrate Judge